Message

From: Benson, Craig [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=87FC7C1B72714936A806B1109C2B0613-CBENSON]

Sent: 3/31/2014 7:57:40 PM

To: Mananian, Eileen@DTSC [Eileen.Mananian@dtsc.ca.gov]; Baker, George@DTSC [George.Baker@dtsc.ca.gov]

CC: Hashemian, Hamid@DTSC [Hamid.Hashemian@dtsc.ca.gov]; Yemut, Emad@DTSC [Emad.Yemut@dtsc.ca.gov];

Whitenack, Craig [Whitenack.Craig@epa.gov]

Subject: RE: OCMP Site investigation summary, future plans, and related information

Hi Eileen. We are getting a bit closer to determining where we (EPA) may be able to step-in and help with the abandoned waste issue. Your summary below is very helpful. An imminent and substantial endangerment determination is a component of our removal funding process and I want to make sure that this doesn't become confused with the State ISE process/determination. Is it accurate to assume that the DTSC ISE addresses only subsurface issues and isn't intended for removal of above-ground abandoned wastes? For instance, "State Orphan Funds" — beyond those that might be available thru H&S Code Sec. 25354 — are for remediation and not removal purposes?

Can I also confirm that reference to DTSC's Cleanup Program is the same as Brownfields and Environmental Restoration Program?

Thanks.

Craig Benson, Federal On-Scene Coordinator Emergency Response Section So. Cal. OSC Supervisor U.S. EPA Region 9

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From: Mananian, Eileen@DTSC [mailto:Eileen.Mananian@dtsc.ca.gov]

Sent: Thursday, March 13, 2014 2:16 PM **To:** Baker, George@DTSC; Benson, Craig

Cc: Hashemian, Hamid@DTSC; Yemut, Emad@DTSC; Whitenack, Craig

Subject: OCMP Site investigation summary, future plans, and related information

Hi George, Craig and Craig,

First off, thank you for relaying the news about USEPA's joint efforts with DTSC to follow through on the emergency removal action for OCMP. It was a pleasure speaking with you all today. The Cleanup Staff will be happy to assist in any way we can to facilitate the cleanup efforts at the Site.

Just for your background, here is an overview of our involvement with the Site in terms of investigation, pilot tests and future plans for cleanup.

Based on a Phase 1 Verification Inspection approved in 2007, a Corrective Action Consent Agreement was signed with the Operator (Manuel Reynoso) in March 2009 to conduct an investigation at the OCMP property. After several attempts to work with Mr. Reynoso and to conduct an Ability to Pay evaluation to assess his ability to conduct the investigation (which he failed to follow through on), DTSC issued an Imminent and Substantial Endangerment Determination for the Site and began using State Orphan Funds (Hazardous Substances Acct./Hazardous Substances Cleanup Acct.) to investigate and eventually remediate the Site.

A soil, soil vapor, and groundwater investigation was conducted in 2012 to identify the areas where VOCs were present in the subsurface and to get a general understanding of groundwater contamination levels and confirm metals concentrations. The rationale for sample placement was based on the 2001 Limited Soil Investigation Report and more recent data from the PCA Metal Finishing facility. Sampling wells were installed in locations that soil vapor samples were collected in anticipation of needing future monitoring. Based on information gathered in the investigation phase, a Soil Vapor Extraction Pilot Workplan was implemented and a SVE Pilot was started. Two extraction wells were installed (one near the fence-line between OCMP and PCA Metals and the other on the western portion of the facility). The SVE Pilot has been operating intermittently since May 2012.

In the meantime, DTSC's Cleanup Program has also conducted additional investigation at the PCA Metal's Site and has also brought on two additional extraction wells to feed into the SVE Pilot that is at OCMP. The PCA Metal's extraction wells have been intermittently operating since about August 2013. The bulk of the VOC plume is located between the fence-line of the two properties.

From this point forward, PCA and OCMP will be considered as one large Site for cleanup purposes due to the location of the plume. Currently, there is a Groundwater Pilot test being evaluated between DTSC and AMEC (our contractor) to evaluate the feasibility of implementing a groundwater remedy at the Site. There is already plans to expand the SVE to accommodate areas where the radius of influence for extraction is not reachable and also performing a soil removal at the PCA Metal's Site. A Cleanup Plan is anticipated to be approved sometime in late 2014 to address, soil, soil vapor and groundwater contamination.

A Preliminary Assessment for the OCMP Site has also been conducted and is in final review with US EPA's Leslie Ramirez: 415-972-3978 / Ramirez.Leslie@epa.gov.

Attached are the following documents: A plume map by depth, and by depth for the two Sites; and an electronic copy of a Title Search Report that should be used for internal purposes only. I've checked with AMEC to send the figure showing historical and current sampling locations/wells. They have figures of each individual Site with all the historical data points, but not one with both together – apparently it becomes a legibility issue if you view it electronically. Each of the figures are included in the Investigation Reports for each Site. The PCA Metal's figures can be found in the documents uploaded on Envirostor (see link below). If you want a copy of the most recent Report, it's in draft form and I can send you a copy if you'd like.

The contact information for Denise French, who performed the Ability to Pay evaluation on the property owners (Colleen Frojen and George Alexander) is: 916 324 8809 / <u>Denise.French@dtsc.ca.gov</u>

Here are the links to the Envirostor page for both Sites:

OCMP: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=71002520
PCA Metals: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=71002520

If you need any additional information, please don't hesitate to contact me or the current project manager, Hamid (Tony) Hashemian at Hamid.Hashemian@dtsc.ca.gov or 714-484-5466.

Thanks,

Eileen Mananian, M.S.

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